

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § **Case No.**
Conn Appliances, Inc. § 24-33357 (ARP)

(Chapter 11)

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

MOTION FOR RELIEF FROM THE STAY

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This motion requests an order from the Bankruptcy Court lifting the stay and allowing movant to proceed against debtor in state court.

1. Movants is Nahomi Sanchez who holds a personal injury claim against Debtor.
2. Movant's estimated value of the claim is unliquidated.
3. Movant seeks relief in that Movants wish to proceed and liquidate their claim in state court and collect the judgment against Conn's insurer and/or third party administrator.
4. Based on the foregoing, movant seeks relief from the automatic stay to allow movant to proceed in its underlying state claim styled Cause No. **2020CVF001231D4; Nahomi Sanchez v Conn Appliance, Inc. 406th JUDICIAL DISTRICT WEBB COUNTY, STATE OF TEXAS.**
5. Movant's certifies that he conferred with counsel for the debtor who informed that he could not state whether he was opposed or not to this motion at this time.

/s/ Ronald Rodriguez
Movant's counsel signature
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Certificate of Service

A copy of this motion was served on counsel of record through the electronic means on this August 12, 2024.

/s/ Ronald Rodriguez
Ronald Rodriguez

**IN THE UNITED STATES BANKRUPTCY COURT
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ORDER GRANTING RELIEF FROM AUTOMATIC STAY
(This Order Resolves Docket # ____)

Nahomi Sanchez (“Movant”) filed a motion for relief from the automatic stay against the debtor, **Conn Appliances, Inc.** Movant represented to the Court that it had served the motion in accordance with all applicable rules.

It is ordered that Movant is granted relief from the automatic stay to pursue its state law remedies against the debtor and proceed in its underlying state claim 2020CVF001231D4; Nahomi Sanchez v Conn Appliance, Inc. 406th JUDICIAL DISTRICT WEBB COUNTY, STATE OF TEXAS, and can proceed with collection efforts against debtor’s third-party administrator and insurer only. Movant must seek relief from this court to collect any judgment obtained in the state claim against debtor Conn Appliances, Inc.

Judge Presiding

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Prepared by
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